

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DOUGLAS J. ABBOTT)	Bankruptcy No. 16-23638CMB
MICHELLE M. ABBOTT)	
)	
Debtors)	Chapter 13
<hr style="width: 40%; margin-left: 0;"/>		
DOUGLAS J. ABBOTT)	
MICHELLE M. ABBOTT)	
)	
Movants)	
vs.)	
)	
ALL CREDITORS)	

STATUS REPORT REGARDING CLASS ACTION LITIGATION

AND NOW COMES, Richard Shenkan and Shenkan Injury Lawyers, LLC., who provides the following status report as sought by the Trustee (ECF 93):

1. Douglas Abbott is a named Plaintiff in a consumer protection class action against M&T Bank captioned *Flynn, et al., v. M&T Bank*, 17-cv-4806-WB (E.D. Pa.).
2. This class action reasonably involves approximately 4,000 Pennsylvania consumers and in excess of \$10 Million. Mr. Abbott has significantly engaged in discovery, including sitting for a deposition.
3. The case is in the class certification briefing stage and Magistrate Judge Richard Lloret is contemporaneously engaging the parties in settlement discussions. There presently is no trial date set.
4. The undersigned respectfully requests that any monies set aside for M&T Bank's claim for a deficiency balance (which remains disputed) continued to be held in escrow pending the resolution of this claim. Deposited with the Clerk of Court is acceptable to the undersigned. Alternatively, the undersigned will deposit the monies in its trust account to be distributed by Court Order if such is more administratively efficient.

The undersigned will promptly supplement, clarify, and/or augment this statement as necessary and appreciates the Trustees' and this Court's continued assistance regarding the handling of funds pertaining to the disposition of this disputed claim. A proposed order to effectuate the handling of this matter is attached for the Trustees' and the Court's consideration.

Respectfully submitted,
SHENKAN INJURY LAWYERS, LLC.
/s/ Richard Shenkan
Richard Shenkan
Attorney for Douglas Abbott